

{In Archive} Re: EPA letter on BDCP Purpose 

Karen Schwinn to: Roger Gorke

06/17/2010 08:03 AM

Bcc: Tom Hagler

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I didn't tell you in advance we were sending the letter but I did send it to you last Thursday.

Note that the letter actually says we need conveyance change. Maybe Lester didn't read that far. We put in italics to emphasize.

We aren't saying what exports should be- the State leg was more specific on that. **Its just pretty clear to all that trying to meet the contract amounts, especially at this point, is not appropriate.**

We are well within "our lane".

Sent by EPA Wireless E-Mail Services
Roger Gorke

----- Original Message -----

From: Roger Gorke

Sent: 06/17/2010 10:35 AM EDT

To: Karen Schwinn

Subject: Re: EPA letter on BDCP Purpose

You sent the letter last week but I didn't see it until Letty handed it to us at the meeting yesterday. Maybe I just didn't realize that a letter was being sent.

Letty actually thinks it is a good thing. Pete is just concerned about concern #4 in the letter about increased deliveries out of the Delta and that this "supply issue" is somewhat out of EPA's lane. Lester keeps spouting off that EPA is opposed to any conveyance which I said, based on conversations we have had, is patently false. I assume the position is that the conveyance should be used to help restore the delta and keep exports where they have been historically rather than the conveyance being purely a method for *increasing* withdrawals.

Roger Gorke
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Karen Schwinn I think you must've. Its been our #1 basic gripe...

06/17/2010 10:16:49 AM

From: Karen Schwinn/R9/USEPA/US
To: Roger Gorke/DC/USEPA/US@EPA
Date: 06/17/2010 10:16 AM
Subject: Re: EPA letter on BDCP Purpose

I think you must've. Its been our #1 basic gripe about BDCP. Lots of conversation here over that few months with Nawi and other feds and State. I know we've talked with Bob P about it at least once also.



{In Archive} California Bay Delta Conservation Plan

Karen Schwinn to: Teri Porterfield

06/29/2010 12:03 PM

Cc: Jared Blumenfeld, Alexis Strauss, Enrique Manzanilla, Keith Takata

Bcc: Tom Hagler

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Teri -

Here's a couple paragraphs to give further context to the issue we 'll be talking with Bob about today at 6:00 EST. Thank you for setting this up . - Karen

The Bay Delta Conservation Plan (BDCP), an HCP under ESA, is one of the critical efforts for agencies and stakeholders working towards Delta water supply reliability and ecosystem restoration. DWR and some of the larger water districts are preparing the BDCP. BOR, FWS and NOAA-Fisheries are leading the NEPA effort on the BDCP, with EPA and the Corps serving as Cooperating Agencies. Over the last couple of years, Region 9 commented during NEPA scoping. After the Federal Bay Delta MOA was signed in September 2009, EPA became more engaged with our federal peers in the BDCP efforts.

DOI has urged all agencies to identify BDCP issues early and elevate those not rapidly resolved. Last year, the NEPA "Purpose Statement" changed to include a goal of "delivering full contract amounts...", with caveats for hydrology and regulation. We flagged this as an issue last year and have gradually gotten more formal with our input. Region 9's June 10 letter (attached below) to the federal lead NEPA agencies is the latest documentation of our concerns. Our action point on this issue doesn't come until the DEIS is published (early 2011), and then later when any 404 permit for conveyance is public noticed. Our NEPA concern in the interim is its constraint on the range and analysis of alternative. Our larger policy concern is over potentially increasing exports from an already stressed system.

Although our federal partners do not disagree with us on this issue, they are unwilling/unable to change the Purpose Statement without the agreement of the State DWR, their partner on the EIS/R. However, the issue may be resolved within the State given the State legislature has raised the issue with DWR, as has the Delta Stewardship Council (a new state agency) and the environmental community.

Unfortunately, we failed to copy any Congressionals on our letter. Last week, we received calls from two offices - Congresswoman Napolitano (Dave Wegner) and Senator Feinstein (Leah Russin). Wegner was positive. Leah Russin, as one of the primary Congressional staff engaged in Delta issues, believed she should have been informed in advance. She did not raise substantive issues. In our conversation with Leah last week, we committed to keep her informed as we take future action.

Alexis and I look forward to talking to Bob at 6:00 EST today.



BDCP.pdf

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{In Archive} EPA and the BDCP

Karen Schwinn to: David_Nawi, Letty_Belin, Feller, Erika M.

09/01/2010 03:54 PM

Cc: gorke.roger

Bcc: Tom Hagler

History: This message has been forwarded.

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Hi all -

I wanted to follow up on the comment I made during the CEQ call today. As David knows, I've been sitting in on most of the Tuesday morning regional Federal BDCP calls, at least for the first hour or so. EPA does not have a role in most of the issues discussed on these calls, but I have a couple of observations I wanted to convey. As these points are not really central to the primary ESA issues the team is grappling with, I have not wanted to belabor these points with the entire group. But they are important to EPA.

The first concerns the degree to which water quality factors into the upcoming draft BDCP. As you probably know, the entire Delta and most of its tributary rivers are listed as impaired under Section 303(d) of the Clean Water Act. That means that they are violating one or more of the CWA standards. Many of the actions being contemplated for the BDCP, both the conveyance and the habitat restoration actions, have the potential of exacerbating these water quality violations. This is especially true when the BDCP actions are combined with other proposed actions.

None of that is news - the water quality issues associated with both the conveyance and restoration activities were studied in depth during the CALFED process. During that process, we (the wq agencies with stakeholder input), determined which water quality parameters should be monitored and used as "performance measures" in evaluating conveyance alternatives and other actions. During BDCP scoping, EPA suggested how the BDCP alternatives should evaluate water quality impacts, drawing on that CALFED work. (see our scoping letter of May 14, 2009)

I understand the discussion on the BDCP will intensify over the next month or so, leading to the release of a draft BDCP of some kind in November. I gather from comments made by others on the Tuesday calls, that the "Effects Analysis" is problematic for many reasons. From EPA's perspective, we are concerned that it will not provide much, if any, of the water quality information we believe is relevant to water quality impacts. Similarly, the EIS/EIR has not yet developed significant information about water quality effects. And, as we have found out recently, the EIS/EIR is being delayed well into next year. Given this, EPA does not have any information upon which to evaluate the current proposals in the BDCP process as they relate to the water quality problems under our purview.

I am not suggesting that this can or should be addressed at this stage. As a tool for ESA compliance, the BDCP needs to address those issues of most concern to the ESA

agencies. Nevertheless, I want to make it very clear that, come November, EPA is not going to be in a position to say much about the draft BDCP (or whatever it will be called). We simply will not have any basis for making any judgments one way or the other.

A second issue I want to flag for further discussion relates to the State Board's recent flow recommendations. Like others, we are assessing the impact of that unique process and its findings. The stakeholders have taken extreme and polar opposite positions on the significance of those recommendations. For our part, the State's scientific findings will certainly have ramifications for EPA's programs. We would like to be part of any federal discussion about how we characterize the State Board's product.

I understand that you are heading into a grueling September and these issues are not at the top of the list. Whenever there's a good time, I am happy to discuss. - Karen

~~~~~  
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OCT 26 2010

Mr. Jared Blumenfeld, Regional Administrator
Mr. Enrique Manzanilla, Director, Communities and Ecosystems Division
Ms. Alexis Strauss, Director, Water Division
U.S. Environment Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

RE: Purpose Statement for Bay Delta Conservation Plan (BDCP)

Dear Messrs. Blumenfeld and Manzanilla and Ms. Strauss:

This letter responds to the June 10, 2010, letter from the Environmental Protection Agency (EPA) to the Bureau of Reclamation, U.S. Fish and Wildlife Service, and National Marine Fisheries Service regarding the Purpose and Need Statement for the Bay Delta Conservation Plan (BDCP) Environmental Impact Statement (EIS).

The BDCP EIS Purpose and Need Statement is part of the Notice of Intent (NOI) to prepare an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) on the BDCP. The NOI was prepared by the National Environmental Policy Act (NEPA) lead Federal agencies: Reclamation, U.S. Fish and Wildlife Service, and National Marine Fisheries Service. **The NOI issued on February 13, 2009, stated that the intent of the BDCP is "... to secure authorizations that would allow projects that restore and protect water supplies, water quality, and ecosystem health to proceed within a stable regulatory framework."** The NOI further explains that water supplies, water quality, and ecosystem health are currently threatened by the levees in the Delta which "... are at constant risk of failure from a number of causes, including seismic activity and sea level rise." The EIS will analyze a range of alternatives designed to address these needs and satisfy the intent of the BDCP.

The NOI stated that one purpose of the BDCP was to "... improve the ecosystem of the Delta ..." by taking actions to contribute to the recovery of listed species, by "... protecting, restoring, and enhancing ..." habitat and ecosystems, and by reducing the adverse impacts to listed species. In addition, the NOI included the following language describing the water supply aspects of the purpose of BDCP:

"Restore and protect the ability of the SWP and CVP (State Water Project and Central Valley Project) to deliver up to full contract amounts, when hydrologic conditions result in the availability of sufficient water, consistent with the

requirements of state and Federal law and the terms and conditions of water delivery contracts . . .”

Our agencies have carefully reviewed the NOI's Purpose and Need Statement in light of the concerns expressed by the EPA and others. The Purpose and Need Statement does not state, and is not intended to imply, that increased quantities of water will be delivered under the BDCP. Rather, it reflects our intent to advance the coequal goals set forth in California's Delta Reform Act of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. See California Water Code Section 85300 et seq. In that regard, we expect the range of alternatives to be considered under NEPA and the California Environmental Quality Act to include one or more alternatives potentially capable of delivering full contract amounts when sufficient water is available, if such deliveries are consistent with ecological actions associated with the goal of restoring the Delta's ecosystem. However, as indicated by the "up to full contract amounts" phrase, alternatives need not be capable of delivering full contract amounts on average in order to meet the project purposes. Average annual south of Delta CVP and SWP deliveries over the past 30 years have been well below full contract amounts. We intend that the phrase "restore and protect . . . up to full contract amounts" delineates an upper bound for the alternatives, not a target. Alternatives that depict design capacities or operational parameters that would result in deliveries of less than full contract amounts are also consistent with this purpose.

In short, we intend that the EIS/EIR evaluate a range of alternatives designed to achieve both a more reliable water supply for the CVP and SWP and restoration of the Delta ecosystem. Consistent with Federal law and the NOI, the alternatives must represent a reasonable range of potential conveyance configurations, water operations, habitat restoration measures, and measures to reduce other stressors capable of achieving the two coequal goals of water supply reliability and Delta ecosystem restoration.

Sincerely,



Ren Lohoefer
Regional Director
U.S. Fish and Wildlife Service
Pacific Southwest Region



Donald R. Glaser
Regional Director
Bureau of Reclamation
Mid-Pacific Region



Rodney McInnis
Regional Administrator
National Marine Fisheries Service
Southwest Region

cc: See next page.

cc: Ms. Nancy Sutley
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Mr. David Nawi
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{In Archive} Re: BDCP EIS Alternatives

Karen Schwinn to: Nawi, David, Idlof, Patricia S

05/17/2011 04:19 PM

"Castleberry, Dan", "Barajas, Federico", "Nepstad, Michael G SPK",
Cc: Michael Tucker, "Fry, Susan M", Tom Hagler, Erin Foresman,
"Jewell, Michael S SPK"

History: This message has been forwarded.

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David and Patti -

Thanks for your recent verbal update summarizing the alternatives that the BDCP Executive Committee is considering for analysis in the NEPA/CEQA document. From that conversation (on May 6), I understand that the Executive Committee would like to finalize the range of alternatives to be analyzed in the BDCP NEPA/CEQA document at their May 19 meeting. You requested that EPA and the Corps identify any questions and concerns about the alternatives before that meeting. I'm sending this to support and supplement yesterday's email response from Mike Jewell of the Corps.

Given the complexity of this process, we thought it would be useful to begin our comments by identifying the status of the environmental analysis for BDCP as it relates to probable Clean Water Act 404 permitting for which the Corps is responsible and EPA maintains an oversight role. As Mike's email mentioned, we have participated with the Corps (as the lead 404 permitting agency) in "pre-application consultations" with the lead federal agencies (FWS, NMFS, BOR) and DWR. The Corps and EPA will occasionally engage in extensive pre-application consultations with probable permit applicants for complex projects to help them consider permitting requirements early in the process and avoid proposing a project that does not qualify for a Clean Water Act Section 404 permit. Although several pre-application discussions have occurred over the last year, it is our understanding that an applicant has not been identified, no application has been submitted to the Corps, and no agreed-upon project definition has been presented to EPA and the Corps. Therefore, for all the reasons Mike's message discussed, we echo the Corps' suggestion that we pursue an MOU to agree on timelines for information requirements, checkpoints and elevation procedures.

Even though your May 5 request for input regarding the range of alternatives is out of step with pursuing a NEPA/404 MOU, we offer a few preliminary observations:

- We have difficulty commenting on alternatives when we don't have an agreed-upon project purpose and have not been provided sufficient information for evaluating project alternatives. In addition, there seems to be confusion about the BDCP purpose, as described in the recent NAS report (see page 3). And we think there is a disconnect between the proposed alternatives, all of which focus on conveyance, and the stated

ecosystem restoration purpose of the BDCP. If ecosystem restoration is one of the major project purposes, we would ordinarily expect to see a more robust discussion of alternatives for that purpose.

- We are encouraged to learn that the range of alternatives considered by the Executive Committee for evaluation in the BDCP NEPA/CEQA document has expanded since the range described in a June 15, 2010 power point presentation developed by the Delta Habitat Conservation and Conveyance Program. Specifically, we understand that the Executive Committee added smaller sized conveyance and a yet-to-be-defined increased outflow alternative for evaluation under NEPA. However, we cannot comment on their potential for meeting CWA permit restrictions or the NEPA requirement for considering a reasonable range of alternatives at the current level of detail. To date we have received: 1) a power point presentation, 2) a table describing operations from February 2010, and 3) a verbal description of the additional 3,000 cfs, "Scenario 6," and increased outflow alternatives from the lead federal agencies.


- We consider water operational scenarios (diversion volume, timing, and frequency alternatives) a major element of each conveyance alternative and note they are the potential source of substantial impact to aquatic resources regulated under CWA Section 404. As we have not seen a detailed description of the operations scenarios or the modeling information associated with these operational scenarios, we express no opinion on their adequacy for 404 NEPA compliance purposes.

The federal agencies are meeting May 25th to discuss 404 issues. It would be useful at that meeting to assess where the lead agencies and regulatory agencies believe the BDCP EIS/EIR process stands and to reconfirm a collective decision on pursuing a NEPA/CWA 404 MOU of some sort.

Thank you for your continued efforts to coordinate these complicated issues within the federal family. I'm sure we'll talk more about this soon..

~~~~~  
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{In Archive} Re: BDCP Purpose 
Karen Schwinn to: Erin Foresman
Cc: Tom Hagler

06/06/2011 03:27 PM

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Thanks for doing this - it should be very useful as this issue gets elevated.

Another minor piece of history - we also raised the P&N issue in our scoping comments - 3/17/08 and 5/14/09 - not so much about the specific language as the need for clarity of what's to be covered by EIS.

~~~~~  
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Erin Foresman

Hi Everyone,

06/06/2011 02:49:14 PM

From: Erin Foresman/R9/USEPA/US
To: Barbara_Beggs@fws.gov, James.Monroe@sol.doi.gov, Lisa.H.Clay@usace.army.mil, melanie.rowland@noaa.gov, Michael.G.Nepstad@usace.army.mil, Michael.S.Jewell@usace.army.mil, Michael.Tucker@NOAA.GOV, Pldlof@usbr.gov, rictorine@mp.usbr.gov, Tom Hagler/R9/USEPA/US@EPA, Deanna.Harwood@noaa.gov, Yvette.Redler@noaa.gov
Cc: David_Nawi@ios.doi.gov, jennifer_norris@fws.gov, Karen Schwinn/R9/USEPA/US@EPA, Kaylee.Allen@sol.doi.gov, Maria.Rea@noaa.gov, michael_hoover@fws.gov
Date: 06/06/2011 02:49 PM
Subject: BDCP Purpose

Hi Everyone,

One of my follow up items from the May 25, 2011 NEPA/404 BDCP meeting is to send a refresher on where we stand with respect to the purpose statement.

Below is a timeline documenting the evolution of the BDCP purpose statement with respect to the lead federal agencies, EPA, and Corps discussions. Attached are the letters EPA and the lead federal agencies exchanged about the purpose statement and meeting notes from the March 17, 2010 meeting between the lead federal agencies; EPA, and the Corps.

BDCP Purpose Statement Timeline

January 24, 2008 NOI

- "...Allow for projects that *restore and protect water supply* , water quality,

ecosystem, and ecosystem health to proceed within a stable regulatory framework... .."

April 15, 2008 FR Amended NOI

- Doesn't have formal purpose or need statements but contains purpose and need language
- "Specifically, Reclamation seeks to improve water supply reliability for Federal water contractors while meeting its FESA obligations." (page 20326, center column).
- The BDCP Description section (page 20327) contains language about several core purposes but none of it directly addresses export volumes from the Delta .

February 13, 2009 FR

The purposes of the proposed actions are to achieve the following :

Respond to the applications for incidental take permits for the covered species that authorize take related to:

1. The operation of existing SWP Delta facilities and construction and operation of facilities for the movement of water entering the Delta from the Sacramento Valley watershed to the existing SWP and CVP pumping plants located in the southern Delta;
2. The implementation of any conservation actions that have the potential to result in take of species that are or may become listed under the ESA pursuant to the ESA at section 10(a)(1)(B) and its implementing regulations and policies ;
3. The diversion and discharge of water by Mirant LLC for power generation in the Western Delta.

Improve the ecosystem of the Delta by:

1. Providing for the conservation and management of covered species through actions within the BDCP Planning Area that will contribute to the recovery of the species; and
2. Protecting, restoring, and enhancing certain aquatic riparian , and associated terrestrial natural communities and ecosystems .
3. Reducing the adverse effects to certain listed species of diverting water by relocating the intakes of the SWP and CVP .

Restore and protect the ability of the SWP and CVP to deliver up to full contract amounts, when hydrologic conditions result in the availability of sufficient water , consistent with the requirements of state and federal law and the terms and conditions of water delivery contracts held by SWP contractors and certain members of SLDMWA .

March 10, 2010

Meeting with BDCP Federal Agencies (Lead = BOR, USFWS, NOAA Fisheries, Cooperating = Corps and EPA). See attached meeting notes compiled by Michael Nepstad , USACE.

- Discuss EPA and Corps discomfort with the following phrases in the February 13, 2009 FR purpose statements.
 - "Restore and protect the ability of the SWP and CVP to reliably divert and deliver water up to *full contract amounts*"
 - Reducing the adverse effects to certain listed species of diverting water *by relocating the intakes of the SWP and CVP* .
- EPA and Corps recommended following changes to February 13, 2009 FR language:

- The operation of existing SWP Delta facilities ~~and construction-~~ Construction and operation of facilities and/or improvements for the movement of water entering the Delta from the Sacramento Valley watershed to the existing SWP and CVP pumping plants located in the southern Delta ;
- Reducing the adverse effects to certain listed species of diverting water ~~by relocating the intakes of the SWP and CVP.~~
- Alter the language regarding "full contract amounts" because it is misleading.

March 17, 2009 BDCP NEPA Purpose Statement Preferred by federal agencies in attendance at 3/17/2010 meeting.

Text below from an email from Melanie Rowland (NOAA) responding to a request from David Nawi (DOI).

This "preferred NEPA purpose statement" would be ready in case the NGOs' request to bring the P&N discussion to the Steering Committee results reopening of the discussion and a request for the federal co-lead agencies' preferred purpose statement. As you'll see, my only substantive edit is to delete "up to full contract amount" and accompanying phrases in the last purpose. We concluded yesterday that while we're all OK with the existing language, if the opportunity arises to express our preference, our preference is to go back to the language we originally drafted before negotiations with the PRE's led to the modified statement. EPA and Corps supported the Preferred Federal Agency NEPA Purpose Statement by email (sent by Karen Schwinn and Michael Jewell).

Preferred NEPA Purpose Statement Draft 3-17-10:

The purposes of the proposed actions are to achieve the following :

A. Respond to the applications for incidental take permits for the covered species that authorize take related to:

- (1) The operation of existing SWP Delta facilities ;
- (2) The construction and operation of facilities and /or improvements for the movement of water entering the Delta from the Sacramento Valley watershed to the existing SWP and CVP pumping plants located in the southern Delta ;
- (3) The implementation of any conservation actions that have the potential to result in take of species that are or may become listed under the ESA , pursuant to the ESA at section 10(a)(1)(B) and its implementing regulations and policies ; and
- (4) The diversion and discharge of water by Mirant LLC for power generation in the Western Delta.

B. Improve the ecosystem of the Delta by:

- (1) Providing for the conservation and management of covered species through actions within the BDCP Planning Area that will contribute to the recovery of the species;
- (2) Protecting, restoring, and enhancing certain aquatic, riparian, and associated

terrestrial natural communities and ecosystems; and
(3) Reducing the adverse effects to certain listed species of diverting water .
C. Restore and protect Delta water supply reliability .

April – May 2010 interagency meetings inform us that purpose statement is not likely to change to the preferred statement identified by attendees at the March 17, 2010 meeting.

June 2010 EPA writes letter to lead federal agencies with comments on the purpose statement .

October 2010 lead agencies respond.

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<http://www.epa.gov/region9/water/watershed/sfbay-delta/index.html>



EPA R9 Comments on BDCP Purpose 061010.pdfLead FED BDCP Purpose and Need Letter 102610.pdf



Five Federal Agency Meeting on the Purpose and Need Statement_10MAR2010_Final.doc



{In Archive} BDCP draft Alternatives Description outline



Karen Schwinn to: Barajas, Federico

09/08/2011 03:11 PM

Cc: "Paul.J.Robershotte@usace.army.mil", david_nawi@ios.doi.gov,
"Nepstad, Michael G SPK", Tanis J SPK Toland, "Idlof, Patricia S"

Bcc: Tom Hagler

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Federico -

Thanks for allowing us to review the outline of the BDCP DEIS chapter on Alternatives. I realize that it is at an early stage and most of the information is yet to developed or added. Because of this missing detail, some of our comments are on the organizational nature of the chapter. We also highlight particular information we will need to make decisions. I expect ICF is already thinking of much of this.

Given the lack of information available to us to date, we are not able to comment on the range of alternatives at this time. We look forward to receiving a package of material, as DWR has committed to provide, to allow us to provide substantive input on the alternatives, and ultimately concurrence per the soon-to-be-final NEPA/404 MOU.

We would be happy to participate in follow-up meetings with the lead agencies or consultants, if that is useful. Feel free to call on myself or Erin for any follow-up.

1. General Comments:

a. The DEIS should include the actual content of any documents that contain critical substance, rather than simply referring to those documents (e.g., "Other ecosystem stressors addressed by conservation measures will be summarized based on the March 25, 2010 Steering Committee Handout guidance").

b. The organizational structure of the alternatives document may make comparisons and presenting information in tables difficult. For example, Alternative 1 includes three separate geographical alternatives, two construction alternatives (pipeline or canal) and two additional construction variations (lined or unlined): Central Delta Pipeline, Eastern Delta canal (lined or unlined), Western Delta canal (lined or unlined).

c. It is confusing how each of the variations within each named alternative will be evaluated. We recommend separately identifying each alternative that will be evaluated so they can more easily be compared. For example, on page 3, Alternative 1 is described as consisting of "either a pipeline/tunnel generally located in the central Delta with an intermediate Forebay, or an unlined or lined canal along the eastern Delta, or an unlined or lined canal along the western Delta".

- d. The DEIS should include detailed maps for each of the alternatives that will be evaluated in the NEPA document. Maps should show the location of alternatives and natural resources. Detailed engineering drawings can be put in an appendix, if you prefer.
2. Introduction - Operational components: The DEIS should include summary descriptions of all the operational pieces of each alternative. Some things are very vague in the Alternatives descriptions at this point like "Fall X2" and "Fall X2 as described in the 2008 and 2009 FWS and NMFS BOs". Are these the same or different?
3. Alternatives Development Process:
- a. It would be helpful to explicitly state that only one geographic location is being considered for the pipeline and why. It is an obvious question that arises when one reads that there are two locations being considered for a canal (whether or not they are lined) and only one location for the pipeline. Likewise, describing how the locations for the canal were derived and why others are not being considered or have been eliminated is appropriate to include in the EIS.
- b. This would be a useful place to describe that since the BDCP is not a water supply augmentation project, water conservation alternatives have not been developed.
4. Screening criteria: Have screening criteria been drafted? Is the "Alternatives Screening Report" complete? As this is one of the "checkpoints" in the NEPA/404 Integration MOU, I expect you'd want to get input from EPA and the Corps asap.
5. Section 3.5.3 – Operational Components: Either here and/or in each of the sections of 3.4, the Operations Criteria need to be described in sufficient detail to be able to analyze the impact on aquatic resources.

~~~~~  
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"Barajas, Federico" Hi Karen and Paul, Attached for your review is...

09/05/2011 08:27:09 AM

From: "Barajas, Federico" <FBarajas@usbr.gov>